

John O. Lukanski, Esq. (JL-2846)
Wolff & Samson PC
The Offices at Crystal Lake
One Boland Drive
West Orange, New Jersey 07052
973-325-1500
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICARDO CASTIBLANCO,

Plaintiff,

vs.

EBER BROS.-NDC, LLC; LESTER EBER;
JOHN DOES 1-5, JOHN DOE, LLC's 1-05;
JOHN DOES, INC. 1-5,

Defendants.

Case No. 08-CV-06029 (LAP)

ECF CASE

**NOTICE OF MOTION FOR
ADMISSION PRO HAC VICE OF
JOSEPH A. DICKSON, ESQ.**

To: Patrick J. Dalton, Esq.
Harris Beach PLLC
99 Gamsey Road
Pittsford, New York 14534

PLEASE TAKE NOTICE that upon the Declarations of John O. Lukanski, Esq. and Joseph A. Dickson, Esq., filed herewith, plaintiff Ricardo Castiblanco ("Castiblanco"), by and through its undersigned counsel, shall move before this Court for entry of an Order pursuant to Local Rule 1.3 (c) granting the admission *pro hac vice* of Joseph A. Dickson, Esq., a member of the firm of Wolff & Samson PC and a member in good standing of the bar of the State of New Jersey, to act as an attorney for plaintiff in this matter. As set forth in the supporting Declaration of Joseph A. Dickson, Esq., there are no pending disciplinary actions against Mr. Dickson in any State or Federal court.

Dated: August 8,2008

WOLFF & SAMSON PC

One Boland Drive
West Orange, New Jersey 07052-3698
(973) 325-1500
jlukanski@wolffsamson.com

By: /s/ John O. Lukanski
JOHN O. LUKANSKI (JL-2846)

DECLARATION OF SERVICE

JOHN O. LUKANSKI, an attorney duly admitted to practice before the United States District Court for the Southern District of New York, declares as follows:

On August 6, 2008, I caused a true copy of the within Notice of Motion for the Admission Pro Hac Vice of Joseph A. Dickson, Esq., together with a copy of the supporting Declarations of John O. Lukanski, Esq. and Joseph A. Dickson, Esq., and a proposed form of Order to be filed to be filed by electronic means with the Clerk of Court, United States District Court of Southern District of New York.

A copy of the foregoing papers was also served by upon counsel for defendants listed below by electronic filing and regular mail:

Patrick J. Dalton, Esq.
Harris Beach PLLC
99 Gamsey Road
Pittsford, New York 14534
Attorneys for Defendant

I declare under penalty of perjury that the foregoing statements are true and correct. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/ John O. Lukanski

Dated: August 8, 2008

John O. Lukanski, Esq. (JL-2846)
Wolff & Samson PC
The Offices at Crystal Lake
One Boland Drive
West Orange, New Jersey 07052
973-325-1500
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICARDO CASTIBLANCO,

Plaintiff,

vs.

EBER BROS.-NDC, LLC; LESTER EBER;
JOHN DOES 1-5, JOHN DOE, LLC's 1-05;
JOHN DOES, INC. 1-5,

Defendants.

Case No. 08-CV-06029 (LAP)

ECF CASE

**DECLARATION OF JOHN O.
LUKANSKI, ESQ. IN SUPPORT OF
ADMISSION *PRO HAC VICE* OF
JOSEPH A. DICKSON, ESQ.**

I, JOHN O. LUKANSKI, ESQ., of full age, hereby certify as follows:

1. I am an attorney at law of the State of New York, a member in good standing of this Court and a partner with the law firm of Wolff & Samson PC, attorneys for plaintiff Ricardo Castiblanco (“Castiblanco”) I submit this Declaration in support of Plaintiff’s motion for entry of an Order pursuant to Local Rule 1.3 (c) granting the admission *pro hac vice* of Joseph A. Dickson, Esq. of Wolff & Samson PC, to act as an attorney for plaintiff in this action.

2. As set forth in detail in the Declaration of Joseph A. Dickson, Esq., submitted herewith, there is good cause for his admission *pro hac vice* in this matter. Mr. Dickson is a member in good standing in the bars of New Jersey and the United States District Court for the District of New Jersey.

3. Mr. Dickson is an associate with the law firm of Wolff & Samson PC, the firm that presently represents Plaintiffs. Mr. Dickson is fully familiar with the substance and procedural history of this action, and I shall also continue to serve as counsel of record in this

matter. Accordingly, Mr. Dickson's admission *pro hac vice* will not delay these proceedings in any manner.

I declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: August 8, 2008

/s/ John O. Lukanski
JOHN O. LUKANSKI, ESQ.

John O. Lukanski, Esq. (JL-2846)
Wolff & Samson PC
The Offices at Crystal Lake
One Boland Drive
West Orange, New Jersey 07052
973-325-1500
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICARDO CASTIBLANCO,

Plaintiff,

vs.

EBER BROS.-NDC, LLC; LESTER EBER;
JOHN DOES 1-5, JOHN DOE, LLC's 1-05;
JOHN DOES, INC. 1-5,

Defendants.

Case No. 08-CV-06029 (LAP)

ECF CASE

**DECLARATION OF JOSEPH A.
DICKSON, ESQ. IN SUPPORT OF
ADMISSION PRO HAC VICE**

I, JOSEPH A. DICKSON, ESQ., of full age, hereby certify as follows:

1. I am an attorney at law of the State of New York and an associate with the law firm of Wolff & Samson PC, attorneys for plaintiff Ricardo Castiblanco ("Castiblanco"). I submit this Declaration in support of Plaintiff's motion for entry of an Order pursuant to Local Rule 1.3 (c) granting my admission *pro hac vice* on behalf of Plaintiff in this action.
2. I have been duly admitted to practice law in the State of New Jersey since 1981, and am a member in good standing of the bar of New Jersey. Attached hereto as Exhibits A is a Certificate of Good Standing for the bar of New Jersey.
3. I am also admitted to practice before and am a member in good standing of the bar of the United States District Court for the District of New Jersey.
4. I have never been convicted of a crime, censured, suspended, disciplined or disbarred by any court.
5. I have never been held in contempt of any court, nor do I have any disciplinary actions, contempt or other proceedings involving myself pending before any court.

6. I am fully familiar with the substance and procedural history of this action and I will be working with John O. Lukanski of Wolff & Samson P.C., who is admitted to practice before and is a member in good standing of the bar of this Court.

7. I respectfully request admission to appear *pro hac vice* before the United States District Court for the Southern District of New York to represent Plaintiff in the above-captioned matter.

I declare under penalty of perjury that the foregoing statements made by me are true and correct.

Dated: August 8, 2008


JOSEPH A. DICKSON, ESQ.

EXHIBIT A

Supreme Court of New Jersey

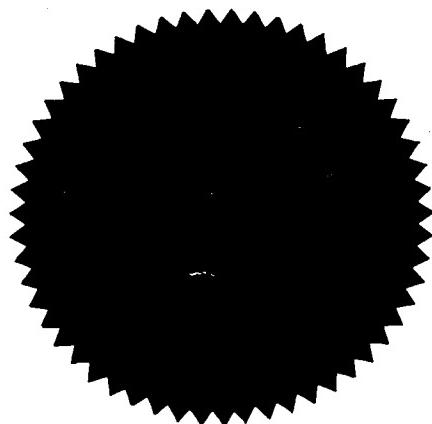


Certificate of Good Standing

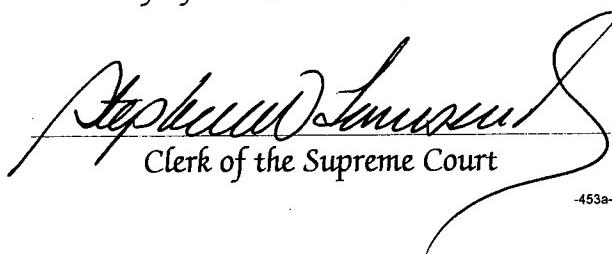
This is to certify that **JOSEPH A DICKSON**
(No. **026091981**) was constituted and appointed an Attorney at Law of New Jersey on **December 17, 1981** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.



In testimony whereof, I have hereunto set my hand and affixed the Seal of the Supreme Court, at Trenton, this 1ST day of August , 20 08


Stephen J. Cammilleri
Clerk of the Supreme Court

John O. Lukanski, Esq. (JL-2846)
Wolff & Samson PC
The Offices at Crystal Lake
One Boland Drive
West Orange, New Jersey 07052
973-325-1500
Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

RICARDO CASTIBLANCO,

Plaintiff,

vs.

EBER BROS.-NDC, LLC; LESTER EBER;
JOHN DOES 1-5, JOHN DOE, LLC's 1-05;
JOHN DOES, INC. 1-5,

Defendants.

Case No. 08-CV-06029 (LAP)

ECF CASE

**ORDER GRANTING *PRO HAC VICE*
ADMISSION OF JOSEPH A.
DICKSON, ESQ.**

The motion for admission to practice *pro hac vice* in the above captioned matter is granted. The admitted attorney, Joseph A. Dickson, Esq., is permitted to argue or try this particular case in whole or in part as counsel or advocate for plaintiff, Ricardo Castiblanco.

An attorney admitted to practice *pro hac vice* is required to pay a \$25.00 attorney admission fee and to present this Order to the intake deputy clerk in the Clerk's Office. When paying by mail, return a copy of this Order to the Clerk's Office with the required fee.

This Order confirms Joseph A. Dickson, Esq.'s appearance as counsel in this case, and it will be entered on the Court's docket. A notation of Joseph A. Dickson, Esq.'s admission *pro hac vice* for the above captioned matter will be made on the roll of attorneys.

The attorney admitted *pro hac vice* must serve a copy of this Order on all other counsel in this case.

Dated: August ___, 2008.

HONORABLE HENRY B. PITMAN